

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
HONX, INC., <sup>1</sup>	)	Chapter 11
Debtor.	)	Case No. 22-90035 (MI)
HONX, INC.,	)	
Plaintiff.	)	Adv. Proc. No. 22-[_____] (MI)
THOSE PARTIES LISTED IN APPENDIX A TO COMPLAINT and JOHN AND JANE DOES 1- 1000,	)	(Emergency Hearing Requested)
Defendants.	)	

**COMPLAINT FOR INJUNCTIVE RELIEF**

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<sup>1</sup> The Debtor in this chapter 11 case, along with the last four digits of the Debtor's federal tax identification number, is HONX, Inc. (2163). The location of the Debtor's service address in this chapter 11 case is: 1501 McKinney Street, Houston, Texas, 77010.

HONX, Inc., as debtor and debtor-in-possession in the above-captioned chapter 11 case (“HONX” or the “Debtor”), files this complaint (the “Complaint”) against plaintiffs (the “Asbestos Claimants”) in current and future asbestos and toxic substance-related actions against the Debtor and its parent, Hess Corporation (“Hess”), arising from Hess Oil Virgin Island Corp. (“HOVIC”), the Debtor’s corporate predecessor, and/or HOVENSA L.L.C.’s (“HOVENSA”) ownership and/or operation of an oil refinery in St. Croix (the “Refinery”) from 1965 through 2015 (the “Asbestos Claims”). These Asbestos Claims include the pending actions identified in **Appendix A** (“Pending Actions”). For the reasons detailed herein and in the *Declaration of Todd R. Snyder, Chief Administrative Officer of HONX, Inc., In Support of Chapter 11 Petition and First Day Motions* (the “First Day Declaration”), the Debtor requests that the United States Bankruptcy Court for the Southern District of Texas (the “Court”) issue a temporary restraining order prohibiting Kadar Mohansingh from continuing to prosecute *Mohansingh v. Hess Oil Virgin Islands Corp., et al.*, SX-2006-CV-00231 (V.I. Super. Ct.) (the “Mohansingh Action”), against Hess. The Debtor also requests that the Court issue a preliminary (and ultimately permanent) injunction pursuant to section 105 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), enjoining the plaintiffs in the Pending Actions (including Mohansingh) from continuing to prosecute such Actions through the effective date of any plan confirmed in the Debtor’s chapter 11 case. Finally, the Debtor asks that the Court, pursuant to section 362 of the Bankruptcy Code, extend the automatic stay as to Hess and enjoin the plaintiffs in the Pending Actions (including the Mohansingh Action) from continuing to prosecute such Actions through the effective date of any plan confirmed in the Debtor’s chapter 11 case. In support of its Complaint, the Debtor alleges as follows:

**PRELIMINARY STATEMENT**

1. Over the last three decades, the Debtor and Hess have been mired in litigation stemming from plaintiffs’ alleged exposure to asbestos and other toxic substances at the Refinery that was previously owned and operated by the Debtor’s predecessor, HOVIC.<sup>2</sup> HONX and its predecessors have been in existence for 57 years, owned and operated the Refinery for more than 30 years, and have defended against asbestos and toxic tort liabilities for decades. The Debtor no longer owns or operates the Refinery, and has not had any operational role in the Refinery for 24 years.

2. The specific cases at issue in this adversary proceeding instead stem from alleged exposure to asbestos and other toxic substances that occurred as far back as 1966, when the Refinery first began operations. The Refinery was originally constructed in 1965 by HOVIC, which owned and operated it until 1998. The Debtor ceased operating the Refinery in 1998 and has not held any financial interest in the Refinery since 2016. In fact, the Debtor has no current operations, employees, or assets—and as a result, Hess for all practical matters is responsible for both managing and funding the Debtor’s defense of the Pending Actions and has now committed to fund this chapter 11 case, subject to the conditions set forth in the funding agreement with Hess (“Funding Agreement”), as defined in the First Day Declaration.

3. There are currently approximately 580 cases alleging toxic substance exposure from the Refinery against either the Debtor alone or the Debtor and Hess as co-defendants.<sup>3</sup> Until

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<sup>2</sup> Any references to HOVIC, HONYC, or HONX in this motion all refer to the same entity—the Debtor—at different points in the Debtor’s corporate history. In May 2020, for efficiency reasons and to consolidate its corporate entities closer to its business operations, Hess effectuated a plan of merger pursuant to which HOVIC merged with and into a newly-formed New York corporation, Hess Oil New York Corp. (“HONYC”). Prior to the commencement of this chapter 11 case, HONYC changed its name to HONX. See Part I of the First Day Declaration and Exhibit B thereto for a discussion and illustration of the Debtor’s corporate history.

<sup>3</sup> In total, there are over 700 cases alleging damages arising from the Refinery filed against the Debtor and/or Hess.

recently, the vast majority of these cases—nearly all pending in territorial courts in the U.S. Virgin Islands—had remained relatively dormant, with no trials scheduled. This changed in July 2021, when the U.S. Virgin Islands legislature passed a “preference statute” allowing individuals over age 65 to request an expedited trial date within 180 days. The trial in the first of these preference cases—the Mohansingh Action—is scheduled to begin on May 2, 2022.

4. To effectuate a successful resolution of this chapter 11 case and work toward the funding of a section 524(g) trust to fairly and definitively resolve the Pending Actions, immediate equitable relief is necessary in addition to the automatic stay’s protection of the Debtor. To that end, this Complaint seeks three forms of relief that are critical to the success of this chapter 11 case:

5. *First*, a temporary restraining order staying the impending Mohansingh Action is necessary for preserving the Debtor’s legal rights and allowing Hess—the Debtor’s parent and funding source—to focus its efforts and resources on the section 524(g) negotiations rather than defending itself in trial.

6. The Mohansingh Action threatens to upend this chapter 11 case at its most critical juncture. The complaint in the Mohansingh Action does not distinguish between Hess and the Debtor, but rather alleges identical causes of action resting on the same core facts and theories of causation. Mohansingh’s theory of liability as to Hess is premised on (1) Hess’s alleged supply of asbestos-containing materials to the Debtor for use in the Refinery, and/or (2) Hess’s alleged control over operations at the Refinery. But to prevail on any of his claims against non-Debtor Hess, Mohansingh must marshal evidence showing that the Debtor failed to protect its employees against exposure to toxic levels of asbestos at the Refinery.

7. As a result, the Mohansingh Action will decide critical issues of law and fact which lie at the core of this chapter 11 case and subsequent negotiations with the Debtor's asbestos creditors. The threshold issue in the Mohansingh trial is whether Mohansingh was exposed to hazardous levels of asbestos and other toxic substances at the Refinery that the **Debtor** (not Hess) owned and operated. Resolution of this threshold question will undoubtedly affect the Debtor's legal rights and defenses, and thereby frustrate the goal of this chapter 11 case: the establishment of a section 524(g) trust to be funded by a contribution from Hess. A temporary restraining order is thus necessary to maintain the status quo and allow the Debtor to proceed through this chapter 11 case efficiently and effectively and to reach an equitable result for the Debtor and the Asbestos Claimants.

8. **Second**, the Court should, pursuant to section 105, issue a preliminary (and ultimately permanent) injunction staying all Pending Actions (including the Mohansingh Action) through the effective date of any chapter 11 plan in the Debtor's case. Hess is instrumental to a successful chapter 11 case for the Debtor. The Debtor and its non-debtor parent Hess are co-defendants in over 570 Pending Actions in the U.S. Virgin Islands stemming from plaintiffs' alleged exposure to asbestos and other toxic substances at the Refinery. Hess has never owned or operated the Refinery, yet plaintiffs—like Mohansingh—have consistently lodged the same core allegations and claims against Hess because Hess is the Debtor's parent corporation and has become the Debtor's funding source since the Debtor became a non-operating entity after the Refinery shut down in 2015. The Debtor no longer owns or operates the Refinery, has no assets or employees of its own, and therefore must rely on Hess to fund this chapter 11 case.

9. Failing to enjoin the Pending Actions against Hess would thus jeopardize this chapter 11 case in two fundamental ways. For one thing, allowing the plaintiffs in the Pending

Actions to move forward with their claims against Hess would effectively require the Debtor to continue litigating hundreds of lawsuits to protect its own legal interests, thus undermining the whole purpose of the automatic stay. As discussed, resolution of the threshold question in each of the Pending Actions—just as in the Mohansingh Action—and the focus of discovery, expert testimony, motions practice, and each trial verdict will directly implicate the Debtor’s legal rights and defenses. For instance, each of these hundreds of cases could involve critical expert disputes concerning the alleged toxicity of asbestos-containing products at the Refinery, depositions of the Debtor’s former employees, and legal conclusions concerning alleged negligence or fraud. There is, accordingly, no practical way to stay the Pending Actions against the Debtor while allowing hundreds of lawsuits to proceed against Hess. Despite the automatic stay, absent an injunction of the Pending Actions, the Debtor will be forced to continue defending those Actions to avoid evidentiary and other determinations that may prejudice the resolution of those Actions and other claims in this chapter 11 case.

10. Moreover, litigating the Pending Actions would force Hess—the Debtor’s parent and source of funding for its chapter 11 case—to focus its resources on litigation defense rather than negotiating a settlement with the Debtor and its creditors, and establishing a section 524(g) trust, further frustrating the Debtor’s ability to achieve an equitable outcome in this chapter 11 case. In the last two years alone, plaintiffs represented by a single Texas law firm—Burns Charest LLP (“Burns Charest”)—have filed over 500 new cases against Hess and the Debtor, the vast majority of which are premised on liability for HOVIC’s operations that occurred over two decades ago. As explained in the First Day Declaration, the volume and expense of managing and litigating this asbestos-related litigation has and will continue to impose substantial financial, administrative, and operating burdens on the Debtor and Hess, and there is no end in sight: Burns Charest has

informed the Debtor that they expect to file approximately *500 more* lawsuits alleging similar claims in the next several years. These pending and future actions threaten to overwhelm the chapter 11 case unless an injunction is entered, and the Debtor is counting on Hess's resources to achieve an equitable resolution of these chapter 11 cases, including through funding the section 524(g) trust.

11. ***Third***, the court should extend the automatic stay to Hess pursuant to section 362 of the Bankruptcy Code. The automatic stay ensures that the Debtor can focus its efforts and resources on a fair and efficient resolution to *all* current and future asbestos-related claims against it through the creation of a 524(g) trust. Extending the stay to Hess is essential to preserving the Debtor's legal rights and defenses and accomplishing its chapter 11 goals here. Absent a stay of the Pending Actions against Hess, the litigation status quo will not change. The plaintiffs in those Pending Actions will simply continue to litigate the exact same asbestos-related claims that are being asserted against the Debtor, with the effect that the Debtor will be dragged back into the litigation and the Debtor's parent—who is funding the Debtor's chapter 11 case—will be pulled away from chapter 11 plan negotiations. This would prejudice the Debtor's right to defend against the plaintiffs' allegations and hinder the Debtor's chapter 11 plan negotiations. It will also distract the funding source of the Debtor's case (and proposed section 524(g) trust), risking the dissipation of funds that Hess would otherwise contribute to the Debtor's case. Therefore, to achieve the goal of a confirmed chapter 11 plan and section 524(g) trust, a stay of the Pending Actions against the Debtor and non-debtor Hess is absolutely necessary.

### **THE PARTIES**

12. HONX is a New York corporation with its principal place of business in Houston, Texas. HONX is a non-operating, wholly-owned subsidiary of Hess. Almost all of the Debtor's current liabilities are legacy liabilities of HOVIC stemming from HOVIC's ownership of the

Refinery from 1965 to 1998. HONX currently has no operations, no employees, minimal assets other than the assets provided via the Funding Agreement as discussed below, and no funded debt.

13. Hess is a Delaware corporation with its principal place of business in New York, New York, and regional headquarters in Houston, Texas. Hess is a global exploration and production company engaged in exploration, development, production, transportation, purchase and sale of crude oil, natural gas liquids, and natural gas.

14. The plaintiffs in the Pending Actions, identified in Appendix A, may, at any time while the chapter 11 case is pending, seek to pursue the Asbestos Claims against the Debtor or Hess.

15. Each of Defendants John and Jane Does 1-1000 is a prospective plaintiff who may, at any time while the chapter 11 case is pending, seek to commence an action to pursue the Asbestos Claims against the Debtor or Hess.

#### **JURISDICTION AND VENUE**

16. The Court has jurisdiction over the parties and the subject matter of this proceeding pursuant to 28 U.S.C. §§ 1334 and Rules 7001(7) and 7065 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rule(s)”). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Pursuant to Bankruptcy Rule 7008 and Rule 7008-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), the Debtor consents to the entry of final orders or judgment by this Court.

17. Venue is proper before the Court pursuant to 28 U.S.C. § 1409.



## **FACTUAL BACKGROUND**

### **Prior Owners of the St. Croix Refinery**

18. HONX is the successor of several corporate entities who owned and operated the Refinery beginning with its initial construction in 1965. HOVIC constructed, owned, and operated the Refinery from the beginning of the Refinery's construction in 1965 until 1998.

19. In 1998, HOVIC formed a 50-50 joint venture with the national oil company of Venezuela, Petróleos de Venezuela, S.A., in which each company held a 50% interest in HOVENSA, the new owner and operator of the Refinery. The effect of this joint venture was that the Debtor had an indirect 50% ownership interest in the Refinery but no longer operated it. HOVENSA acquired the Refinery through the joint venture transaction and operated the Refinery from October 1998 until February 2012. In February 2012, the Refinery ceased all refining operations after suffering losses of \$1.3 billion in its last three years of operation. For the next three years, HOVENSA used the Refinery as an oil storage facility until the Refinery was completely shut down in March 2015.

### **HOVENSA Bankruptcy and Releases**

20. On September 16, 2015, HOVENSA filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code to run a sale process for its assets that also ultimately led to the resolution of HOVENSA's environmental liabilities. The sale transaction was completed in January 2016, and since that time, HOVIC has not held any financial interest in the Refinery. The Debtor does not have any business operations currently in the U.S. Virgin Islands. Hess has never had any business operations in the U.S. Virgin Islands.

21. As part of HOVENSA's chapter 11 plan, Hess and the Debtor received a full release of all direct and derivative claims held by HOVENSA's estate. In addition, Hess and the Debtor received certain releases of all claims arising from HOVENSA's operation of the Refinery from

third parties that voted in favor of the plan and did not affirmatively opt out of those releases. To the extent any third party did not vote to accept or reject the plan, voted to reject the plan, or affirmatively opted out of the plan releases, their claims for alleged injuries arising from HOVENSA's operations of the Refinery were not released.

22. After the HOVENSA bankruptcy, the Debtor had no operations or ownership interests in St. Croix, and there was no longer any operational purposes for a Virgin Islands-based subsidiary. Consequently, in May 2020, HOVIC merged with and into a newly-formed New York corporation, HONYC.

### **Relevant History of the Refinery**

23. The Debtor's sole relationship to asbestos-containing products (and related litigation) is as the owner and operator of the Refinery, which was designed and built by independent contractors. The Debtor has never manufactured or sold any asbestos-containing products. Hess, for its part, has never owned or operated the Refinery, nor has it manufactured, maintained, or possessed any asbestos-containing products in relation to the Refinery. Throughout its history, the Debtor contracted with general and independent contractors to design and construct the Refinery, including by sourcing, installing, and managing the insulation. These contractors were contractually and legally responsible for the safety of their employees, including warning and protecting them from exposure to asbestos and following all applicable laws and regulations.

24. The Debtor broke ground on the Refinery in 1965, and completed the final phase of construction in 1974. During that time, the Debtor contracted with numerous general contractors and engineering companies to design and construct the Refinery and to provide the Debtor with the services and materials necessary to complete construction of the Refinery. The lead general contractor during the majority of construction was Litwin Corporation (later Litwin

PanAmerican), who was responsible for, among other things, designing refining units, purchasing materials, and inspecting and managing construction of the refining units. Thus, while the Debtor reviewed the specifications and plans throughout the construction of the Refinery, all of the material specifications—including the specifications for insulation products—were developed by outside contractors and provided to the Debtor.

25. Refining processors require insulation materials that must meet certain design and material specifications to perform under extremely high temperatures. During construction of the Refinery and until the 1980s, the Debtor did not have its own insulation specifications but instead relied on the design specifications of its general contractors. During the construction of the Refinery in the 1960s and early 1970s, those design specifications could be fulfilled through the supply of calcium silicate or, in the alternative, asbestos. While calcium silicate is considered a safe alternative to asbestos, some calcium silicate insulation in the 1960s and 1970s made use of asbestos fibers. As a result, the Debtor's general contractors sourced and installed asbestos insulation and calcium silicate containing asbestos during at least some of the phases of construction of the Refinery, although the presence of asbestos at the Refinery was not confirmed until 1982.

26. During the construction of the Refinery, Hess assisted in facilitating the purchase of insulation materials by the Debtor. Specifically, the Debtor would provide Hess with specifications for the necessary insulation materials (including manufacturer, quantities, diameters, and material type) and, in certain instances, Hess would facilitate the ordering of these materials and assist in expediting the materials to the Debtor.

27. Hess never owned or possessed any of the asbestos-containing products it ordered for the Debtor's Refinery and shipped to St Croix. Instead, Hess acted merely as a conduit for the

Debtor's acquisition of the materials, facilitating the Debtor's purchase of materials that were ultimately installed in the Debtor's Refinery by employees of the Debtor's contractors. Throughout the entirety of the Debtor's operations at the Refinery, Hess's presence at the Refinery was limited to discrete oversight activities, including assisting the Debtor through periodic inspections regarding worker safety and providing periodic guidance and recommendations regarding safety and health policies and procedures.

28. The Debtor strictly prohibited the use of any asbestos-related products in 1983 following its first confirmation that insulation at the Refinery contained asbestos, and it took extensive steps to ensure that its workers would not be exposed to hazardous levels of asbestos.

29. For example, the Debtor issued an asbestos policy modeled on OSHA regulations and subsequently adopted the Hess Asbestos Policy and an Asbestos Management Program. The HOVIC Policies and Procedures provided guidelines that were imposed on all contractors and their employees. Before any workers were involved in the removal or cleanup of any potential asbestos-containing insulation at the Refinery, the insulation was tested to confirm whether it contained asbestos. If positive, a crew trained in removing asbestos-containing insulation would remove the insulation using appropriate safety precautions that prevented the abatement crew and other workers at the facility from exposure to asbestos. In 1987, the Debtor went even further and instituted the Asbestos Abatement Program to proactively identify the presence of asbestos in the areas of the facility where workers may be present and to facilitate its removal consistent with national safety standards. These policies continued throughout the Debtor's ownership and operation of the Refinery.

**The Pending Asbestos Cases and the Imminent Mohansingh Action**

30. Starting in 1987, numerous former Refinery workers began suing the Debtor and Hess in the U.S. Virgin Islands for alleged exposure to asbestos and/or other toxic substances at the Refinery.

31. Since that time, *more than 1,000* plaintiffs have filed suit against the Debtor and Hess in the U.S. Virgin Islands under numerous theories of tort liability, alleging exposure to asbestos-containing compounds and other toxic substances at the Refinery.

32. In July 2021, the U.S. Virgin Islands legislature passed a preference statute allowing individuals over age 65 to request an expedited trial date within 180 days. The trial in the first of these preference cases—the Mohansingh Action—is scheduled to begin on May 2, 2022. The second expedited trial under the preference statute is scheduled for October 2022, and discovery is ongoing in that case.

33. Jury selection in the Mohansingh Action began just last week, and opening statements are set to begin May 2, 2022. The plaintiff, Kadar Mohansingh, filed his complaint against Hess and the Debtor in 2006, alleging injuries due to exposure to asbestos “and asbestos-containing products” while working at the Refinery from 1970–1981 and 1988–2009. Mohansingh does not suffer from lung cancer or mesothelioma. In fact, Mohansingh has never been diagnosed (outside of the litigation) with an asbestos-related disease. He suffers from shortness of breath, due to his asthma, which is exacerbated by his obesity, advanced age, and other non-employment related health conditions. After filing his complaint in 2006, Mohansingh *signed a release of all claims* against the Debtor and Hess. In exchange for this release, Mohansingh received approximately one year’s wages and continued healthcare coverage for himself and his family. Hess and the Debtor subsequently moved for summary judgment on the ground that Mohansingh’s claims were subject to this broad release. Despite agreeing that

Mohansingh signed a broad release that covered his claims against both the Debtor and Hess, the Mohansingh trial court nevertheless denied the motion on procedural grounds.

34. The complaint in the Mohansingh Action does not distinguish between Hess and the Debtor. Instead, it alleges identical causes of action resting on the same core facts and theories of causation against both the Debtor and Hess for: negligence; supply of dangerous chattel (*i.e.*, asbestos-containing compounds); and fraudulent concealment of the inherent risk posed by exposure to asbestos.

35. The claims against the Debtor and Hess in the Mohansingh Action are inextricably intertwined and rest on the same core facts and theories of causation. Mohansingh's theory of liability as to Hess is premised on (1) Hess's alleged supply of asbestos-containing materials to the Debtor for use in the Refinery and/or (2) Hess's alleged control over operations at the Refinery. But to prevail on any of his claims against non-debtor Hess, Mohansingh must marshal evidence showing that the Debtor failed to protect its employees against exposure to toxic levels of asbestos at the Refinery. Thus, although the Mohansingh Action asserts claims against both the Debtor and Hess, it is based on the allegedly negligent conduct of the Debtor.

36. The pretrial submissions in this case make clear that Mohansingh seeks to introduce evidence at the upcoming trial showing that his alleged injuries were caused by asbestos exposure at the Refinery that the Debtor failed to protect against and/or fraudulently concealed. Mohansingh seeks to develop an evidentiary record establishing that: (1) the Debtor and Hess "knew that putting millions of pounds of asbestos into the Refinery posed a foreseeable hazard to workers and others"; (2) "asbestos was ubiquitous throughout the Refinery" throughout Mohansingh's employment; and (3) "adequate asbestos-handling procedures were not established on paper until

1987” and “even after 1987, there was lax protection for the Refinery’s workers.” April 15, 2022 Jt. Final Pretrial Order, Mohansingh Action, at 3.

37. Mohansingh has identified 27 potential witnesses for the upcoming trial—only six of whom could testify as to Hess’s conduct. *Id.* at 13–15. The remaining fact witnesses include Mohansingh, his wife, and former co-workers at the Refinery who will testify about Mohansingh’s alleged exposure to asbestos during his employment. For example, Mohansingh expects that one of these former co-workers will testify that after Hurricane Hugo struck the U.S. Virgin Islands in 1989, “thousands of pounds of asbestos insulation and other materials were scattered throughout the Refinery”; workers “picked up asbestos and other debris”; and that Mohansingh “constantly came into contact with [asbestos-containing] insulation.” *Id.* at 4. The Debtor, of course, has every interest in cross-examining this witness at trial and presenting testimony of its own witnesses that would counter these allegations.

38. Hess, for its part, has argued throughout the litigation that it cannot held be liable for conduct that occurred at a facility it never owned or operated, and it moved for summary judgment on that ground. On April 19, 2022, the court in the Mohansingh Action denied Hess’s motion for summary judgment. *See generally* Order Denying Defs.’ Mot. for Part. Summ. J. re Premises Liability, Mohansingh Action. Although the automatic stay enjoins the Mohansingh Action from proceeding against the Debtor, Mohansingh still intends to prosecute his claims as to the non-Debtor, Hess.

### **The Debtor’s Settlement Efforts**

39. Prior to filing the chapter 11 case, the Debtor and Hess made numerous attempts to resolve the asbestos litigation through ad hoc settlement negotiations with plaintiffs’ counsel and alternative dispute resolution.

40. Between 2010 and 2017, the Debtor and Hess successfully settled the claims of 194 plaintiffs that had been pending in the U.S. Virgin Islands. In 2018, the Debtor and Hess entered into a settlement agreement with approximately 498 plaintiffs and their counsel, including the Burns Charest firm (the “Gomez Settlement”). As an out-growth of this settlement, the parties negotiated an agreement whereby future claimants could submit their claims for pre-suit resolution through non-binding mediation process facilitated by renowned mediator, Kenneth Feinberg.

41. Unfortunately, this near-global resolution of asbestos litigation against the Debtor and Hess was short-lived: Despite the plain terms of the Gomez Settlement, the Debtor and Hess’s attempt to resolve cases through the mediation process has proven difficult and incomplete. For instance, the Debtor and Hess engaged with hundreds of plaintiffs represented by Burns Charest—a signatory to the Gomez Settlement—but Burns Charest did not follow through with the agreed mediation process and began filing separate lawsuits instead. Indeed, in the last two years, plaintiffs represented by Burns Charest have filed over 500 new cases against Hess and the Debtor, all premised on liability for the Debtor’s and/or HOVENSA’s operations of the Refinery. Many of these cases are now potentially eligible for an expedited trial schedule due to the preference statute. Simply put, the mass settlement has only led to more and more litigation against an entity with limited assets and no operations or revenue.

42. Each of the Pending Actions presents unique facts, circumstances, and allegations. Although the lawsuits contain common allegations of asbestos exposure and related injuries, they involve workers employed by different contractors, who worked in different roles, at different times, in different areas of the Refinery, while different policies and procedures were in place. Each plaintiff requires the assessment of a different health profile and different medical situation,



which in turn requires substantial expert analysis and discovery into events that occurred decades ago.

### **The Bankruptcy Case**

43. The costs of resolving and defending the Pending Actions against the Debtor are significant. Plaintiffs' counsel has stated that it intends to file at least 500 more cases in the coming years. After careful consideration of the available alternatives, the Debtor concluded that commencement of a chapter 11 case premised on using a trust and channeling injunction pursuant to section 524(g) of the Bankruptcy Code was necessary to fairly, efficiently, and permanently resolve all pending and future Asbestos Claims. This approach serves to the benefit of both the Debtor, its related parties (if certain circumstances are met), and current and future plaintiffs who will be able to take advantage of a singular process to resolve their claims. Accordingly, on April 28, 2022, the Debtor commenced a chapter 11 case, at which point all litigation against the Debtor was automatically stayed pursuant to section 362 of the Bankruptcy Code.

44. As described further in the First Day Declaration, prior to filing its chapter 11 case, HONX negotiated a Funding Agreement pursuant to which Hess agreed to advance certain funds for the chapter 11 case and a section 524(g) settlement trust under certain conditions specified therein. Importantly, the Funding Agreement contains express "milestones" that trigger additional funding. Those milestones include obtaining a temporary restraining order enjoining the Mohansingh Action within three business days of the filing of the chapter 11 case, and obtaining an extension of the stay to Hess within 65 days of the filing of the chapter 11 case. Failure to reach these milestones puts the Debtor's funding—and the success of this bankruptcy case and funding of an equitable trust under section 524(g) of the Bankruptcy Code—at risk.

**NATURE OF RELIEF REQUESTED**

45. Through this Complaint, the Debtor requests three counts of relief to protect the Debtor for the duration of this chapter 11 case. **Count One** requests a temporary restraining order enjoining continued litigation of the Mohansingh Action as to Hess.

46. **Count Two** requests a preliminary injunction (and ultimately permanent) injunction, pursuant to section 105 of the Bankruptcy Code, of all Pending Actions (including the Mohansingh Action) until the effective date of any plan confirmed in the Debtor's chapter 11 case.

47. **Count Three** requests a preliminary (and ultimately permanent) injunction, pursuant to section 362 of the Bankruptcy Code, extending the automatic stay to Hess with respect to all Pending Actions (including the Mohansingh Action) until the effective date of any plan confirmed in the Debtor's chapter 11 case. With a stay of the Pending Actions, the Debtor can focus on prosecuting the chapter 11 case, conducting an estimation trial, and engaging with stakeholders to negotiate and fund a section 524(g) trust without the distraction of (and dissipation of funds from) ongoing litigation against Hess that implicates HONX.

**COUNT ONE**

**(Temporary Restraining Order as to Mohansingh)**

48. To prevent the foregoing harmful effects upon the Debtor's estate, the Debtor requests that, on an emergency basis, the Court issue a temporary restraining order prohibiting and enjoining the continued prosecution of the Mohansingh Action as to Hess.

49. Section 105(a) authorizes the Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title" and provides this Court with broad, equitable powers to "assure the orderly conduct of the reorganization proceedings." 11 U.S.C. § 105(a); *In re Hunt*, 93 B.R. 484, 491 (Bankr. N.D. Tex. 1988) (citing *In re Baldwin-United Corp. Litig.*, 765 F.2d 343, 348 (2d Cir. 1985)). Accordingly, "[t]he Court may

issue injunctions as part of its equitable powers, pursuant to 11 U.S.C. § 105.” *In re OGA Charters, LLC*, 554 B.R. 415, 424 (Bankr. S.D. Tex. 2016); *see also In re Zale Corp.*, 62 F.3d 746, 761 (5th Cir. 1995); *In re Yukos Oil Co.*, 320 B.R. 130, 135 (Bankr. S.D. Tex. 2004). Bankruptcy courts routinely invoke section 105(a) to enjoin actions against non-debtor entities that would frustrate a successful chapter 11 case, including a case involving a section 524(g) trust and channeling injunction.<sup>4</sup>

50. The Mohansingh Action against the Debtor would fall within the scope of section 524(g), as a personal injury action “seeking recovery for damages allegedly caused by the presence of, or exposure to, asbestos or asbestos-containing products.” 11 U.S.C. § 524(g)(2)(B)(i)(I). Section 524(g) expressly authorizes the extension of permanent injunctive relief to non-debtors alleged to be directly or indirectly liable for asbestos claims against the debtor. 11 U.S.C. § 524(g)(4)(A)(ii) (“Notwithstanding the provisions of section 524(e), such an injunction may bar any action directed against a third party who is identifiable from the terms of such injunction (by name or as part of an identifiable group) and is alleged to be directly or indirectly liable for the conduct of, claims against, or demands on the debtor[.]”). Given that the Debtor expects Hess to

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<sup>4</sup> *See, e.g., In re Zale Corp.*, 62 F.3d at 761 (temporary section 105 injunction may be imposed “when the third-party action will have an adverse impact on the debtor’s ability to accomplish reorganization”); *In re Acis Cap. Mgmt., L.P.*, 604 B.R. 484, 525 (N.D. Tex. 2019) (collecting cases), *aff’d sub nom. Matter of Acis Cap. Mgmt., L.P.*, 850 F. App’x 302 (5th Cir. 2021); *In re Bestwall LLC*, 606 B.R. 243, 253-58 (Bankr. W.D.N.C. 2019), *aff’d*, 2022 WL 68763 (W.D.N.C. Jan. 6, 2022); *In re Purdue Pharms. L.P.*, 619 B.R. 38, 57 (S.D.N.Y. 2020) (“§ 105(a) is properly used to enjoin creditors’ lawsuits against third parties where ‘the injunction plays an important part in the debtor’s reorganization plan’ or where the action to be enjoined ‘will have an immediate adverse economic consequence for the debtor’s estate’” (citation omitted)); *see also In re Caesars Ent. Operating Co., Inc.*, 561 B.R. 441, 451 (Bankr. N.D. Ill. 2016) (“Bankruptcy courts have often enjoined litigation against a non-debtor, usually but not always a guarantor of the debtor’s debts, who intends to contribute financially to the debtor’s reorganization.” (collecting cases)); *Sec. Inv’r Prot. Corp. v. Bernard L. Madoff Inv. Sec. LLC*, 443 B.R. 295, 316 (Bankr. S.D.N.Y. 2011) (“[C]ourts have consistently utilized section 105(a) to extend section 362 to third-party actions against non-debtor entities ‘when a claim against the non-debtor will have an immediate adverse economic consequence for the debtor’s estate.’”) (quoting *Queenie, Ltd. v. Nygard Int’l*, 321 F.3d 282, 287 (2d Cir. 2003)), *aff’d sub nom. In re Bernard L. Madoff Inv. Sec. LLC*, 2011 WL 7975167 (S.D.N.Y. Dec. 15, 2011); *In re Calpine Corp.*, 365 B.R. 401, 409 n.20 (S.D.N.Y. 2007) (“Courts consistently have found that section 105(a) may be used to stay actions against non-debtors even where section 362 otherwise would not provide such relief, recognizing that section 105 grants broader authority than section 362.”).

qualify for this relief at the conclusion of this chapter 11 case, it is appropriate to extend these protections on a preliminary basis pending a final judgment.

51. The Debtor meets each of the four requirements for injunctive relief: “(1) a substantial likelihood of success on the merits, (2) a substantial threat of irreparable injury if the [temporary restraining order] is not issued, (3) that the threatened injury if the [temporary restraining order] is denied outweighs any harm that will result if the [temporary restraining order] is granted, and (4) that the grant of a [temporary restraining order] will not disserve the public interest.” *Jones v. Tex. Dep’t of Criminal Justice*, 880 F.3d 756, 759 (5th Cir. 2018); *see also In re Yukos Oil Co.*, 320 B.R. at 135.

#### **The Debtor is Likely to Succeed on the Merits**

52. The Debtor will likely prevail on the merits of its request for an injunction halting the Mohansingh Action during the pendency of the Debtor’s chapter 11 case. The Debtor must only “show a likelihood of success on the merits rather than actual success” to obtain preliminary relief, including a temporary restraining order. *ICEE Distribs., Inc. v. J&J Snack Foods Corp.*, 325 F.3d 586, 596 n.34 (5th Cir. 2003) (quoting *Amoco Prod. Co. v. Vill. of Gambell, Alaska*, 480 U.S. 531, 546 n.12 (1987)). To do so, “a plaintiff must present a prima facie case but need not show a certainty of winning.” *Texas v. United States*, 328 F. Supp. 3d 662, 710 (S.D. Tex. 2018) (internal citations omitted). The focus of the “likelihood of success” element is on the “purpose of the requested injunction.” *In re FiberTower Network Servs. Corp.*, 482 B.R. 169, 182 (Bankr. N.D. Tex. 2012) (quoting 2 Collier on Bankruptcy ¶ 105.03[1][a] (16th ed. 2012)). The crux of the inquiry is “whether this court is authorized and likely to grant the requested relief.” *Id.* at 183.

53. Here, the absence of a stay of the Mohansingh Action would threaten the Debtor’s ability to successfully negotiate a settlement with claimants and fund a section 524(g) trust because it will drag the Debtor into ongoing litigation and force Hess—the Debtor’s funding source—to

focus its efforts and resources not on the chapter 11 case, but on the Mohansingh Action, which involves identical claims against the Debtor and Hess. Litigating these identical claims presents the risk of adverse rulings and findings as to the Debtor, compelling the Debtor's involvement. Failure to impose a stay also risks default of the Funding Agreement and losing funding for this chapter 11 case and, ultimately, the section 524(g) trust. An injunction is thus essential, and the lack of a stay threatens the Debtor's ability to reorganize. *See, e.g., In re Zale Corp.*, 62 F.3d at 761; *A.H. Robins Co., Inc. v. Piccinin*, 788 F.2d 994, 1003–06 (4th Cir. 1986) (stating that section 105 injunction may be appropriate where proceeding would have an adverse impact on debtor's ability to reorganize or deplete property of estate); *In re Drexel Burnham Lambert Grp., Inc.*, 960 F.2d 285, 293 (2d Cir. 1992) (approving injunction because settlement was “unquestionably an essential element” of reorganization and injunction a “key component” of settlement).

**The Debtor Will Suffer Irreparable Harm Absent a Stay of the Mohansingh Action**

54. The Debtor will suffer irreparable harm if the impending Mohansingh Action trial proceeds against Hess. It is well settled that a debtor satisfies the requirement of irreparable harm where he will suffer an injury “for which there is no adequate remedy at law” that is not speculative or remote, but actual and imminent. *See Daniels Health Scis., L.L.C. v. Vascular Health Scis., L.L.C.*, 710 F.3d 579, 585 (5th Cir. 2013); *Allied Home Mortg. Corp. v. Donovan*, 830 F. Supp. 2d 223, 227 (S.D. Tex. 2011). Moreover, “the mere fact that economic damages may be available does not always mean that a remedy at law is ‘adequate.’” *Janvey v. Alguire*, 647 F.3d 585, 600 (5th Cir. 2011); *see also In re OGA Charters*, 554 B.R. at 424–25. Here, the Debtor will suffer multiple, independent irreparable harms absent a stay of the Mohansingh Action.

55. **First**, the Mohansingh Action will determine critical issues of law and fact that bear directly on the Debtor's legal rights and defenses and implicate the core of the settlement

negotiations at the center of this chapter 11 case. Without a stay, key issues related to the Refinery and the Debtor's alleged negligence in operating that Refinery will be decided in the Debtor's absence. There is a therefore material risk that findings of law or fact in the Mohansingh Action could create an adverse record against the Debtor at a time where the Debtor is trying to focus its efforts on negotiating a settlement with asbestos creditors that can resolve all Pending Actions on fair and reasonable terms.<sup>5</sup> As a result, the Debtor will have to redirect its efforts to continue trying to manage the Mohansingh Action to protect its legal interests, while simultaneously trying to negotiate an end to its liability through the chapter 11 case. "These are consequences the Debtor should not be required to suffer (or be compelled to protect against)." *In re Bestwall LLC*, 606 B.R. at 256.

56. **Second**, continued prosecution of the Mohansingh Action will threaten the Debtor's ability to achieve its goal of a successful chapter 11 case through establishment of a section 524(g) asbestos trust, which will be funded at least in part by Hess. Proceeding with the Mohansingh Action will require Hess to redirect its attention and resources away from funding the chapter 11 case, and toward the trial instead. That prejudices not only the Debtor, but the hundreds of asbestos claimants who will ultimately seek to benefit from a section 524(g) trust in the chapter 11 case. If the Mohansingh Action is not stayed, a monetary judgment in favor of Mohansingh (in addition to Hess's substantial legal expenditures to litigate the case to verdict) will siphon off assets that would otherwise be used to fund a section 524(g) trust for the benefit of all claimants. As a result, substantial assets that would otherwise be distributed fairly and equitably

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<sup>5</sup> Even if the doctrine of collateral estoppel does not apply, the mere risk of preclusion also warrants a temporary stay. *See In re Bestwall LLC*, 606 B.R. at 256 ("Courts have concluded that the risks of collateral estoppel and res judicata warrant a stay of third-party litigation because allowing that litigation to proceed would thwart the purposes of the automatic stay." (collecting cases)). The Debtor will not be able to "unring the bell" once evidence is introduced and becomes intertwined with other evidence and argument. Findings concerning those facts then pose a risk of future prejudice to the Debtor, despite its inability to litigate those issues at trial.

through the section 524(g) trust will have to be redirected to defend against (and potentially pay) a single plaintiff by virtue of his case being the first to reach a jury verdict.

57. **Third**, failure to obtain a temporary restraining order poses an existential threat to the Debtor's entire reorganization because without a stay, the Debtor risks losing the funding necessary to carry the Debtor through the conclusion of its chapter 11 case. In addition to covenanting to maintain a \$10,000,000 reserve to fund any future section 524(g) trust, Hess has committed to a baseline administrative expense fund of approximately \$11,000,000, disbursed in two tranches, with additional funding provided upon reaching certain milestones. The first milestone is a temporary restraining order as to the Mohansingh Action, which is essential to providing Hess and the Debtor breathing room to engage in the chapter 11 process with the ultimate goal of reaching a resolution with plaintiffs. Continued litigation of the Mohansingh Action therefore puts the Debtor's funding arrangement—and the effectiveness of this chapter 11 case—at substantial risk.

58. **Fourth**, the Mohansingh Action will threaten the integrity of any potential future estimation proceedings in the chapter 11 case because (as discussed above) Mohansingh is a highly unrepresentative plaintiff who could skew the estimation for hundreds of other pending and future plaintiffs. The goal of the estimation proceeding is for the Debtor—as the fiduciary of the bankruptcy estate for the benefit of creditors—to establish a fair and equitable estimate of the claims of all current and future asbestos plaintiffs, including by presenting evidence reflecting a representative sample of claimants. Current and future asbestos claimants therefore may actually have an interest in staying the Mohansingh Action to avoid a trial judgment that could skew the estimation proceedings based on the claims of a highly unrepresentative plaintiff.

### **The Balance of the Equities Weighs in Favor of the Debtor**

59. Staying the Mohansingh Action will increase the odds of resolving hundreds of pending and future cases on fair and equitable terms, while serving little to no prejudice to Mohansingh. In considering a request for injunctive relief, a court must “balance the competing claims of injury and . . . consider the effect on each party of the granting or withholding of the requested relief.” *Texas*, 328 F. Supp. 3d at 740 (quoting *Amoco Prod. Co.*, 480 U.S. at 542); *see also In re OGA Charters*, 554 B.R. at 431 (noting that the “the analysis focuses on the degree to which each party will be harmed if a preliminary injunction should be entered and whether, in consideration of those harms, the harm of one party outweighs another”). Here, the Debtor is seeking a limited stay of litigation which is essential to its reorganization goals. At worst, Mohansingh would experience a slight delay in receiving any payment that he may be awarded, but that momentary delay pales in comparison to the years Mohansingh has already spent litigating his lawsuit through the tort system—to say nothing of the burdens of appeal if he obtains a judgment.

### **The Public Interest Favors a Stay of the Mohansingh Action**

60. The public interest favors entry of a temporary restraining order enjoining the Mohansingh Action. “Evaluation of the public interest factor of the analysis ‘requires a balancing of the public interest in successful bankruptcy reorganizations with other competing societal interests.’” *In re Calpine Corp.*, 365 B.R. at 413 (quoting 2 Collier on Bankruptcy ¶ 105.02[2] (15th ed. 2006)). “In the bankruptcy context, the relevant public interest is the interest in successful reorganizations, since reorganizations preserve value for creditors and ultimately the public.” *In re Caesars Ent. Operating Co., Inc.*, 561 B.R. at 453 (collecting cases); *see also In re Bestwall LLC*, 606 B.R. at 258 (collecting cases); *In re OGA Charters*, 554 B.R. at 426. Staying the Mohansingh Action is consistent with the public’s strong interest in efficiently and equitably



resolving all asbestos-related claims through the centralized chapter 11 process, as reflected in the text of section 524(g) and expounded upon in the relevant legislative history. *See In re Grossman's Inc.*, 607 F.3d 114, 126–27 (3d Cir. 2010) (discussing legislative history); *In re Fed.-Mogul Glob. Inc.*, 684 F.3d 355, 359 (3d Cir. 2012) (quoting H.R. Rep. No. 103–835, at 46–48 (1994)). A stay here is instrumental to achieving the dual purpose of section 524(g), so that Mohansingh and all other asbestos claimants can achieve a fair and efficient resolution of their claims and the Debtor can definitively put this litigation behind it as part of a successful reorganization.

61. For all of these reasons, it is appropriate for the Court to grant the temporary restraining order on an emergency basis.

## **COUNT TWO**

### **(Section 105: Preliminary and Permanent Injunction)**

62. The Court has broad authority under section 105(a) of the Bankruptcy Code to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].” 11 U.S.C. § 105(a). Pursuant to section 105(a), this Court may enjoin actions against third parties where necessary to prevent an adverse effect on the Debtor’s estate or to assure the orderly administration of the Debtor’s chapter 11 case. Bankruptcy courts routinely invoke section 105(a) to enjoin actions against non-debtor entities—like Hess—that would frustrate a successful chapter 11 case, including the establishment of a section 524(g) trust and channeling injunction. The Debtor seeks an injunction barring the plaintiffs in the Pending Actions from commencing or continuing any Asbestos Claims—including the Mohansingh Action—against Hess under section 105(a) of the Bankruptcy Code, through the effective date of any plan confirmed in this chapter 11 case.

63. The Debtor meets each of the four requirements for a preliminary (and ultimately permanent) injunction. *See Jones*, 880 F.3d at 759.

64. **First**, there is a substantial likelihood that the Debtor will prevail on the merits of its request for an injunction enjoining the Pending Actions during the pendency of the Debtor's chapter 11 case. For the reasons discussed above, there is ample support for entry of an injunction here, because the absence of a stay would threaten the success of the Debtor's efforts to achieve consensus by dragging the Debtor back into the very litigation that is stayed by the filing of this case. *See In re Zale*, 62 F.3d at 761; *In re A.H. Robins*, 788 F.2d at 1003-06; *In re Drexel*, 960 F.2d 285, 293 (2d Cir. 1992); *see also* 2 Collier on Bankruptcy ¶ 105.04 (16th ed. 2020) ("The most notorious use of section 105 has been to seek to enjoin actions which, for one reason or another, are not stayed by the automatic stay of section 362.").

65. **Second**, the failure to grant the requested injunction would irreparably harm the Debtor's chapter 11 negotiations and ability to resolve all current and future Asbestos Claims against it under section 524(g). The Asbestos Claims against Hess and the Debtor are based on substantially identical conduct concerning the Debtor and/or HOVENSA's operations of the Refinery. Plaintiffs do not meaningfully distinguish between the Debtor and Hess and seek to hold both jointly and severally liable for the same alleged conduct. Absent a stay of the trial, the litigation will proceed as planned: plaintiffs will continue with discovery, dispositive motions, and trial, and final judgments against Hess—all while the Debtor is pursuing its chapter 11 case. This would prejudice the Debtor's right to defend against the plaintiffs' allegations concerning HOVIC's operations of the Refinery, which are directly relevant to the Debtor's liability.

66. Furthermore, because the Asbestos Claims against Hess and the Debtor are substantially similar, there is a material risk that findings of law or fact in the cases will create an adverse record against the Debtor, and one that may conflict with the Court's claim estimation proceedings in the chapter 11 case. On top of all this, the costs and effort of defending against the

Pending Actions will only continue to grow as more and more cases are scheduled for expedited trials pursuant to the U.S. Virgin Island's preference statute. Continued litigation of the Pending Actions will require Hess's involvement and supervision over the litigation, requiring funds and resources that could otherwise be allocated towards supervising this chapter 11 case.

67. **Third**, the balance of the harms weighs heavily in favor of an injunction. Failure to issue an injunction will not only cause significant harm to the Debtor's reorganization goals, but it will also prejudice certain plaintiffs by leading to different recoveries among similarly situated claimants depending on whether they recover through the tort system or a future, court-approved section 524(g) trust. On the other hand, the harm, if any, that issuing an injunction might cause the plaintiffs is minimal. Litigation, particularly mass tort asbestos litigation, generally requires extensive discovery, involves numerous parties, and presents complicated questions of causation. Such litigation is rarely efficient and often goes on for many years, as many of the Pending Actions illustrate. By contrast, enjoining the Asbestos Claims in favor of a section 524(g) trust in the chapter 11 case would allow for more efficient and uniform recoveries for plaintiffs—including future claimants who have yet to institute litigation—than are typically possible outside of the bankruptcy.

68. **Finally**, the public interest weighs strongly in favor of an injunction. As courts and Congress have recognized, there is a substantial public interest in a successful chapter 11 case, and injunctive relief is critical to the Debtor's chapter 11 case for the reasons discussed already. It also is in the public interest to promote justice in the court system by resolving all Asbestos Claims in a fair and equitable manner. This result is not possible if piecemeal litigation of the Asbestos Claims in the tort system circumvents the bankruptcy process. For that reason, a successful

chapter 11 case—and an injunction that makes a successful case possible—serves the public interest by fostering the resolution of thousands of claims in a uniform and equitable manner.

69. An injunction barring the Defendants from commencing or continuing any Asbestos Claims against the Hess while the chapter 11 case remains pending is appropriate and essential to the orderly and effective administration of the Debtor’s estate. Good cause exists for the entry of injunctive relief pursuant to section 105 of the Bankruptcy Code and Bankruptcy Rule 7065.

### **COUNT THREE**

#### **(Preliminary and Permanent Injunction Extending Automatic Stay Pursuant to Section 362)**

70. The purpose of section 362 of the Bankruptcy Code is to “give the debtor a ‘breathing spell’ from his creditors, and also, to protect creditors by preventing a race for the debtor’s assets.” *See, e.g., Garza v. CMM Enters., LLC (In re Garza)*, 605 B.R. 817, 827 (Bankr. S.D. Tex. 2019); *Commonwealth Oil Refin. Co. v. U.S. Env’t Prot. Agency (In re Commonwealth Oil Refin. Co.)*, 805 F.2d 1175, 1182 (5th Cir. 1986) (citation omitted).

71. The Court has the authority to extend the automatic stay to non-debtor third parties and may invoke section 362(a) to stay proceedings against non-debtors that “will have an adverse impact on the debtor’s ability to accomplish reorganization.” *See In re Matter of Zale Corp.*, 62 F.3d 746, 761, n.45 (5th Cir. 1995).

72. This is a textbook example of why section 362(a) exists. The continued prosecution of the Pending Actions against Hess will entirely undermine the Debtor’s ability to achieve its goals in this case. Without a stay of litigation against Hess, the Debtor will be forced to continue participating in hundreds of actions to defend its rights while issues critical to the Debtor’s liability in the underlying asbestos allegations are decided through the tort system. If the Pending Actions

continue to proceed, the Debtor will have to decide whether to (a) participate in the Pending Actions to protect its rights, and be burdened with the distraction of having to continue litigating the Pending Actions in the midst of its chapter 11 efforts, or (b) not participate in the Pending Actions and risk having its legal rights affected by the plaintiffs' pursuit of Asbestos Claims against Hess. At the same time, the Debtor's parent—the sole source of the Debtor's funding under the Funding Agreement—will be tied up in costly litigation instead of focusing its efforts and resources on chapter 11 plan negotiations and funding of the section 524(g) trust.

73. Failing to stay the Pending Actions against Hess would not only hamstring the Debtor's efforts at resolving its chapter 11 case, but it would also undermine the very purpose of the automatic stay. Plaintiffs in the Pending Actions would effectively be permitted to sidestep the automatic stay by continuing to litigate the Pending Actions against Hess alleging the same facts and theories directed at the Debtor and its predecessors but without the Debtor at the table to defend itself. Section 362(a) was implemented for precisely this reason, and should be employed to enjoin Pending Actions against non-debtor Hess here.

### **PRAYER FOR RELIEF**

WHEREFORE, the Debtor respectfully requests the following relief:

- (i) That this Court issue a temporary restraining order prohibiting Mohansingh from continuing to prosecute *Mohansingh v. Hess Oil Virgin Islands Corp., et al.*, SX-2006-CV-00231 (V.I. Super. Ct.), against Hess;
- (ii) That this Court issue, pursuant to section 105 of the Bankruptcy Code, a preliminary (and ultimately permanent) injunction enjoining plaintiffs in the Pending Actions (including the Mohansingh Action) from prosecuting such actions until the effective date of any chapter 11 plan confirmed in the Debtor's chapter 11 case;
- (iii) That this Court issue, pursuant to section 362 of the Bankruptcy Code, a preliminary (and ultimately permanent) injunction enjoining plaintiffs in the Pending Actions (including the Mohansingh Action) from prosecuting such actions until the effective date of any chapter 11 plan confirmed in the Debtor's chapter 11 case;
- (iv) Grant such other and further relief as the Court may deem just and proper.

Houston, Texas  
April 28, 2022

*/s/ Matthew D. Cavanaugh*

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**Certificate of Accuracy**

I certify that the foregoing statements are true and accurate to the best of my knowledge. This statement is being made pursuant to Bankruptcy Local Rule 9013-1(i).

/s/ Matthew D. Cavanaugh  
Matthew D. Cavanaugh

**Certificate of Service**

I certify that on April 28, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew D. Cavanaugh  
Matthew D. Cavanaugh

**Appendix A**



Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Abraham Perez-Rivera	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00632	Burns Charest LLP
Abraham, Narcisse	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00943	Burns Charest LLP
Adams, Melvine Sr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00883	Burns Charest LLP
Agatha Louis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00995	Burns Charest LLP
Agnes Alphonse	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00536	Burns Charest LLP
Agnes Andrew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00107	Burns Charest LLP
Agnes Dalsan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00646	Burns Charest LLP
Agnes John	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00157	Burns Charest LLP
Alana Finney	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00720	Burns Charest LLP
Albert Edwards, Jr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00750	Burns Charest LLP
Albert Elliott	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00424	Burns Charest LLP
Albert Ince	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00326	Burns Charest LLP
Albert J Williams	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00885	Burns Charest LLP
Albert Stanislas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00849	Burns Charest LLP
Albert Tayliam	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00080	Burns Charest LLP
Albert Victor	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2019-CV-00247	Burns Charest LLP
Alexander Charles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00460	Burns Charest LLP
Alexander St Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00143	Burns Charest LLP
Alexander, David Adrian	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00816	Burns Charest LLP
Alexandrine Abraham	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00880	Burns Charest LLP
Alicia Mars	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00594	Burns Charest LLP
Alita V Theophilus-Phillipp	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00173	Burns Charest LLP
Allan Austin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00829	Burns Charest LLP
Allan English	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00324	Burns Charest LLP
Alton Elliot	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00724	Burns Charest LLP
Alvin Sonson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00741	Burns Charest LLP
Alwyn John Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00515	Burns Charest LLP
Amelina Marc Louis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00101	Burns Charest LLP
Andre Jean	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00068	Burns Charest LLP
Andres Velazquez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00169	Burns Charest LLP
Angel Gautier	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00742	Burns Charest LLP
Angel Rodriguez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00991	Burns Charest LLP
Angel Santos-Rios	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00858	Burns Charest LLP
Angela Faucher	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00110	Burns Charest LLP
Angela Poleon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00730	Burns Charest LLP
Anna Arnold	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00192	Burns Charest LLP
Anna Gordon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00073	Burns Charest LLP
Annabelle Riviere	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00060	Burns Charest LLP
Annette Parris-Delgado	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00153	Burns Charest LLP
Anselm Alexander	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2004-CV-00602	Burns Charest LLP
Anthony Laurencin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00342	Burns Charest LLP
Antoine Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00737	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Aquino-De la Rosa, Ovidio	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00868	Burns Charest LLP
Arelis Pena-Arendell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00440	Burns Charest LLP
Arlington Bergan	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00323	Burns Charest LLP
Arroyo, Hector	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00958	Burns Charest LLP
Arthur Carter	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00297	Burns Charest LLP
Arthur John Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00140	Burns Charest LLP
Audrey Gustave	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00164	Burns Charest LLP
Avan Casimir	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00034	Burns Charest LLP
Avis Reid	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00647	Burns Charest LLP
Baltimore, Link	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00047	Burns Charest LLP
Barry, James	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00841	Burns Charest LLP
Barthelmy Dantes	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00243	Burns Charest LLP
Batista, Juan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00951	Burns Charest LLP
Bazil, Joanness	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00843	Burns Charest LLP
Beharry, Lawrence J, Sr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00260	Burns Charest LLP
Beharry, Pascal W	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00673	Burns Charest LLP
Belardo, Fidel	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00201	Burns Charest LLP
Belardo, Hector C.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00834	Burns Charest LLP
Benjamin, Alford D	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00956	Burns Charest LLP
Bernadette Abraham-Soldiew	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00191	Burns Charest LLP
Bernadine John Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00428	Burns Charest LLP
Bernard Williams	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00875	Burns Charest LLP
Bernard, Angelo	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00080	Burns Charest LLP
Bernett Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00526	Burns Charest LLP
Bhola, Anthony	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00840	Burns Charest LLP
Bibiana Philogene	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00534	Burns Charest LLP
Blake Caldena	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00870	Burns Charest LLP
Blake, Irvine E	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00942	Burns Charest LLP
Boland, Veronica	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00903	Burns Charest LLP
Bougouneau, Francisca	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00016	Burns Charest LLP
Bougouneau, Francisca Andrea	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00578	Burns Charest LLP
Bougouneau, Jeremiah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00859	Burns Charest LLP
Bowery, Ira	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00042	Burns Charest LLP
Brown, Clarence G	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00579	Burns Charest LLP
Brown, Frank	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00869	Burns Charest LLP
Browne, Alexis H	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00955	Burns Charest LLP
Browne, Alfred	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00864	Burns Charest LLP
Browne, Edwin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00049	Burns Charest LLP
Burke, Tyrone	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00944	Burns Charest LLP
Candida Acosta-Lewis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00104	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Canice McFarlane	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00761	Burns Charest LLP
Carlos P Mulrain	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00740	Burns Charest LLP
Carmela Errilienne	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00523	Burns Charest LLP
Carmen Lopez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00612	Burns Charest LLP
Carmen Mayfield	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00033	Burns Charest LLP
Carmen Santiago	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00102	Burns Charest LLP
Carolyn Maynard	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00623	Burns Charest LLP
Castro Pablo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00851	Burns Charest LLP
Catherine Antoine	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00304	Burns Charest LLP
Catherine Charles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00833	Burns Charest LLP
Catherine Daniel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00108	Burns Charest LLP
Catherine Phillip	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00352	Burns Charest LLP
Celestine Gordon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00362	Burns Charest LLP
Celina Bodley	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00131	Burns Charest LLP
Charles Deterville	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00812	Burns Charest LLP
Charles Jacob	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00097	Burns Charest LLP
Charles Powell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00616	Burns Charest LLP
Charles, Cuthbert R	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00876	Burns Charest LLP
Charles, Ita	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00015	Burns Charest LLP
Ched Antoine, as PR for Jamfes Antoine	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00273	Burns Charest LLP
Cheryann Thomas-Cooke	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00026	Burns Charest LLP
Cheryl Azille	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00029	Burns Charest LLP
Cheryl Richardson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00805	Burns Charest LLP
Christian Farrelly	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00976	Burns Charest LLP
Christine Daniel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00165	Burns Charest LLP
Claudette King	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00168	Burns Charest LLP
Claudius Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00063	Burns Charest LLP
Clement Languedoc	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00766	Burns Charest LLP
Clinton Henry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00114	Burns Charest LLP
Clouden, Elvita	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00827	Burns Charest LLP
Clovis, Lawrence	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00966	Burns Charest LLP
Combie, Eliza	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00857	Burns Charest LLP
Consula Matthew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00617	Burns Charest LLP
Cora Straker	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00025	Burns Charest LLP
Coria Rene	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00409	Burns Charest LLP
Cornelia Louis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00066	Burns Charest LLP
Cornelius Mitchell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00128	Burns Charest LLP
Creighton, Theresa	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00038	Burns Charest LLP
Cristino Cruz	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00988	Burns Charest LLP
Cyrilla Christophe	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00726	Burns Charest LLP
Cyrille Paul	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00989	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Daisy Francis-Christopher	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00806	Burns Charest LLP
Dalmau-Estrada, Carlos	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00022	Burns Charest LLP
Daniel, Noel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00580	Burns Charest LLP
Davidson Abraham	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00271	Burns Charest LLP
Davis, Rupert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00928	Burns Charest LLP
Davon Walter, as the PR of the Estate of Lunid Walter	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00821	Burns Charest LLP
Dayatra Emmanuel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00369	Burns Charest LLP
De Lande, Clefryn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00679	Burns Charest LLP
Decima John Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00011	Burns Charest LLP
Defreitas, Gilbert M.	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00045	Burns Charest LLP
Degrasse, William	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00866	Burns Charest LLP
Denis Dariah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00344	Burns Charest LLP
Denis, Alphonsus	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00177	Burns Charest LLP
Denis, Placide	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00043	Burns Charest LLP
Dennery, Arthur	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00967	Burns Charest LLP
Dennis Barnes, Jr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00994	Burns Charest LLP
Deschamps, Malcolm	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00863	Burns Charest LLP
Desir, Urias JW	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00678	Burns Charest LLP
Dexter Arthurton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00721	Burns Charest LLP
Dillon Inglis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00664	Burns Charest LLP
Donawa, Clarence Eustace	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00582	Burns Charest LLP
Donawa, Ian	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00829	Burns Charest LLP
Donnelly, Tricia	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00068	Burns Charest LLP
Doran, Garfield	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00837	Burns Charest LLP
Dorita Trimmingham, as the Personal Representative and Executor of the Estate of Leroy W Trimmingham	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00683	Burns Charest LLP
Douglas, Charles (Christian)	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00821	Burns Charest LLP
Drayton, Cleavelly	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00264	Burns Charest LLP
Ducreay, Isaiah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00851	Burns Charest LLP
Dudley Cox	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00731	Burns Charest LLP
Duncan, Tyrone	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00925	Burns Charest LLP
Dyett, George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00968	Burns Charest LLP
Eardley Howard Charles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00645	Burns Charest LLP
Eastman, Felix	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00026	Burns Charest LLP
Efraim Soto-Santos	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00302	Burns Charest LLP
Egbert Carlton Hall	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00462	Burns Charest LLP
Elderfield Richards	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00059	Burns Charest LLP
Eleanor Abraham	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00100	Burns Charest LLP
Eleanor Roseline	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00626	Burns Charest LLP
Elford Christmas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00764	Burns Charest LLP
Elias Bodley, as PR of Estate of Roland Bodley	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00684	Burns Charest LLP
Elpher Prosper	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00505	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Elsworth Stevenson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00359	Burns Charest LLP
Emerald Finney	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00610	Burns Charest LLP
Emika Archibald	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00611	Burns Charest LLP
Emil Joseph	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00280	Burns Charest LLP
Emmanuel Augustin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00454	Burns Charest LLP
Emmanuel, Hyacinth	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00960	Burns Charest LLP
Enoch Simon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00992	Burns Charest LLP
Enrique Ayala	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00872	Burns Charest LLP
Est. of Alexis Denis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2004-CV-00606	Burns Charest LLP
Est. of Felix Colon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2008-CV-00271	Burns Charest LLP
Est. of Fitzroy Roberts	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00219	Burns Charest LLP
Est. of Patrick Mathurin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00223	Burns Charest LLP
Estate of Arnold Anthony	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2004-CV-00607	Burns Charest LLP
Estate of Eli McKenzie	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00653	Burns Charest LLP
Estate of Ezekiel Farrell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2015-CV-00506	Burns Charest LLP
Estate of Francisco Carrasquillo-Acosta	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00615	Burns Charest LLP
Estate of James Hughes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00221	Burns Charest LLP
Estate of Nicholas George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2005-CV-00221	Burns Charest LLP
Estate of Rosemary Nicholas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00684	Burns Charest LLP
Estate of Scipio Murren	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2015-CV-00504	Burns Charest LLP
Esther Theobbbles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00855	Burns Charest LLP
Eugenia East	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00811	Burns Charest LLP
Eugenia JnMarie	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00196	Burns Charest LLP
Eugenia Stanley	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00421	Burns Charest LLP
Eunice George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00446	Burns Charest LLP
Eustace Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00139	Burns Charest LLP
Evans, Gualbert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00954	Burns Charest LLP
Evans, Hugh	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00886	Burns Charest LLP
Everton Knight	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00034	Burns Charest LLP
Exilia Fonetenelle	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00824	Burns Charest LLP
Ezra Celestin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00831	Burns Charest LLP
Fabian, Patricio	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00871	Burns Charest LLP
Fahie, Royce H	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00873	Burns Charest LLP
Farrow, Oliver	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00849	Burns Charest LLP
Felice Grant	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00556	Burns Charest LLP
Felicite Patricia Albert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00624	Burns Charest LLP
Felipe Ledesma	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00299	Burns Charest LLP
Felipe Rios	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2015-CV-00505	Burns Charest LLP
Felix, Anthony	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00855	Burns Charest LLP
Ferdinand Abraham	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00272	Burns Charest LLP
Figuerola, Carlos J	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00945	Burns Charest LLP
Fitzroy B Matthew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00531	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Flood, Cynthia	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00889	Burns Charest LLP
Floretta Prevost	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00160	Burns Charest LLP
Fonda Gill, As The PR of The Estate of Emerson Gill	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00008	Burns Charest LLP
Forde, Linroy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00924	Burns Charest LLP
Fox, Melwyn Elias	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00585	Burns Charest LLP
Frances Mondesir	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00245	Burns Charest LLP
Francois St Remy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00874	Burns Charest LLP
Frank Jeremiah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00081	Burns Charest LLP
Frederico Garcia	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00030	Burns Charest LLP
Freeman, Sr., Eugene T.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00809	Burns Charest LLP
Gabriel Alexander	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00237	Burns Charest LLP
Garcia, Felix	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00020	Burns Charest LLP
Garcia, Juan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00838	Burns Charest LLP
Garcia, Reynaldo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00822	Burns Charest LLP
Gaston, Simone	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00900	Burns Charest LLP
Gee Cuffy, Jr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00506	Burns Charest LLP
Gemma Mitchell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00070	Burns Charest LLP
George Fontenelle	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00099	Burns Charest LLP
George Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2019-CV-00249	Burns Charest LLP
George, Cuthbert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00823	Burns Charest LLP
Gerard Nelson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00192	Burns Charest LLP
Gerard St Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00982	Burns Charest LLP
Gertrude John	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00542	Burns Charest LLP
Gertrude St Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00535	Burns Charest LLP
Gervais, Rufinus	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00027	Burns Charest LLP
Gifford, Alain	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00833	Burns Charest LLP
Gilbert, Idonia	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00167	Burns Charest LLP
Gilbert, Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00674	Burns Charest LLP
Gladstone Browne	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00838	Burns Charest LLP
Gomez, Oscar	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00094	Burns Charest LLP
Gonzague, Augusta	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00059	Burns Charest LLP
Gonzales, Glen	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00946	Burns Charest LLP
Gonzalez, Mario	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00844	Burns Charest LLP
Grace Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00111	Burns Charest LLP
Green, Tony Curtis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00939	Burns Charest LLP
Greenaway, Dan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00856	Burns Charest LLP
Greene, Alwyn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00050	Burns Charest LLP
Gregor Richelieu	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00637	Burns Charest LLP
Guadalupe, Domingo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00814	Burns Charest LLP
Guadalupe, Javier, Jr.	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00051	Burns Charest LLP
Gwendolyn Jacobs	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00305	Burns Charest LLP



Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Hamilton, Ambrose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00267	Burns Charest LLP
Harold Abraham	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00242	Burns Charest LLP
Heafline Bannis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00105	Burns Charest LLP
Helen Isidore	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00725	Burns Charest LLP
Helena Denbow	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00856	Burns Charest LLP
Henreker Liburd	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00857	Burns Charest LLP
Henry Gonzague, Jr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00355	Burns Charest LLP
Henry, George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00041	Burns Charest LLP
Henry, Mary G.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00804	Burns Charest LLP
Henry, Michael	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00044	Burns Charest LLP
Henry, Miles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00964	Burns Charest LLP
Henry, Nicholas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00587	Burns Charest LLP
Henry, Paul (Mediated)	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00915	Burns Charest LLP
Henson Emanuel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00863	Burns Charest LLP
Hinkson, Francilla	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00898	Burns Charest LLP
Hollis Prime	District Court of the Virgin Islands, Division of St. Croix.	1:2021-cv-00292	Burns Charest LLP
Hospedales, Roderick	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00831	Burns Charest LLP
Humberto Ayala	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00773	Burns Charest LLP
Ingrid Benton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00729	Burns Charest LLP
Jackline Finney	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00357	Burns Charest LLP
Jaime Castro	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00074	Burns Charest LLP
James , Francis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00850	Burns Charest LLP
James McNamara, as PR of Estate of Luke Frederick	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00674	Burns Charest LLP
James, Brenda	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00905	Burns Charest LLP
James, Irwin L	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00269	Burns Charest LLP
James, Jerome	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00828	Burns Charest LLP
Janelle Coburn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00837	Burns Charest LLP
Janine McBean	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00633	Burns Charest LLP
Jarvis, Leroy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00965	Burns Charest LLP
Jean, Larry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00045	Burns Charest LLP
Jeanne David	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00792	Burns Charest LLP
Jeffers, Wilfred Z	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00953	Burns Charest LLP
Jeremiah Felicien	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00873	Burns Charest LLP
Jno-Baptiste, Nicholas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00258	Burns Charest LLP
Joan John	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00028	Burns Charest LLP
Joanna Desir	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00109	Burns Charest LLP
Joanna Leon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00744	Burns Charest LLP
Joel Tutein	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00303	Burns Charest LLP
John B William	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00628	Burns Charest LLP
John Desouza	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00743	Burns Charest LLP
John Manie	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00796	Burns Charest LLP
John Paul	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00354	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
John Ramdhanny	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00848	Burns Charest LLP
Jorge Soto	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00839	Burns Charest LLP
Jose Lopez-Acosta	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00062	Burns Charest LLP
Jose Sanchez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00614	Burns Charest LLP
Joseph Herelle	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2019-CV-00252	Burns Charest LLP
Joseph Joaquin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00760	Burns Charest LLP
Joseph Mess	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00052	Burns Charest LLP
Joseph Prescott	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00301	Burns Charest LLP
Joseph Vigilant Hill	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00728	Burns Charest LLP
Joseph, Elwin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00832	Burns Charest LLP
Joseph, George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00952	Burns Charest LLP
Joseph, Judith	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00054	Burns Charest LLP
Joseph, Kenneth	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00894	Burns Charest LLP
Joseph, Magilta	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00055	Burns Charest LLP
Joseph, Selwin George	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00895	Burns Charest LLP
Joshua S Browne	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00408	Burns Charest LLP
Jovo Cotto Jr.	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00277	Burns Charest LLP
Joyce James Galiber	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00325	Burns Charest LLP
Joyceline Noelien	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00103	Burns Charest LLP
Joycelyn Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00621	Burns Charest LLP
Juan Alamo	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00190	Burns Charest LLP
Judith Doran	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00620	Burns Charest LLP
Julia Charles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00447	Burns Charest LLP
Julianna Evans	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00132	Burns Charest LLP
Julie James	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00370	Burns Charest LLP
Julietta Coleman	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00864	Burns Charest LLP
Kadar Mohansingh	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2006-CV-00231	Burns Charest LLP
Kendall Roberts	Superior Court of the Virgin Islands, Division of St. Croix.	SZ-2006-CV-00238	Burns Charest LLP
Kendrick Elcock	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00525	Burns Charest LLP
Lazare, Louise	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00847	Burns Charest LLP
Leblanc, Alex G	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00266	Burns Charest LLP
Lenroy Drew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00071	Burns Charest LLP
Leon, Aybert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00881	Burns Charest LLP
Leon, Michael	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00858	Burns Charest LLP
Leonce, Phylis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00067	Burns Charest LLP
Lester Vigilant	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00622	Burns Charest LLP
Liburd, Dave	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00861	Burns Charest LLP
Lilda Decaille	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00444	Burns Charest LLP
Ling, Michael Lee	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00802	Burns Charest LLP
Linton Robertson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00115	Burns Charest LLP
Lisa Braithwaite	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00507	Burns Charest LLP
Lopez-Quintana, Juan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00025	Burns Charest LLP



Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Lubin, Jonah N	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00268	Burns Charest LLP
Lucette Merced-Green	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00172	Burns Charest LLP
Lucia Marcelle	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00738	Burns Charest LLP
Lucille Henry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00823	Burns Charest LLP
Lucy C Talian	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00718	Burns Charest LLP
Lydia McIntosh	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00166	Burns Charest LLP
Lyne Turnbull-James	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00734	Burns Charest LLP
Mable Cuffy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00119	Burns Charest LLP
Maharaj, Devraj	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00114	Burns Charest LLP
Maishaleen Lopez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00613	Burns Charest LLP
Malvina Jackson	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00365	Burns Charest LLP
Margarita Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00155	Burns Charest LLP
Marguerite Wilton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00521	Burns Charest LLP
Maria Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00423	Burns Charest LLP
Maria M Hepburn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00868	Burns Charest LLP
Maria R Guadalupe-Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00865	Burns Charest LLP
Maria Sanes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00170	Burns Charest LLP
Marian Mitchell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00867	Burns Charest LLP
Marie Auguste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00358	Burns Charest LLP
Marie Serieux	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00631	Burns Charest LLP
Marilyn Nyack	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00595	Burns Charest LLP
Mario Carroll	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00098	Burns Charest LLP
Mariska Scotland	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00866	Burns Charest LLP
Mark Victor	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00835	Burns Charest LLP
Martin, Telbert	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00923	Burns Charest LLP
Martina Simeina	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00345	Burns Charest LLP
Mary Anna Weeks	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00540	Burns Charest LLP
Mary Clercin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00836	Burns Charest LLP
Mary Eugene	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00194	Burns Charest LLP
Mary Glover	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00067	Burns Charest LLP
Mary Leon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00368	Burns Charest LLP
Mary Longville	District Court of the Virgin Islands, Division of St. Croix.	1:2021-cv-00244	Burns Charest LLP
Mary Lucille	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00532	Burns Charest LLP
Mary Maxwell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00615	Burns Charest LLP
Mary St Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00366	Burns Charest LLP
Massicott, Jeanneol S	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00879	Burns Charest LLP
Mathurin, Bernard	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00892	Burns Charest LLP
Mathurin, Gregory	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00927	Burns Charest LLP
MathurinVitalis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00012	Burns Charest LLP
Maxwell, Weldon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00845	Burns Charest LLP
Maynard Lazare	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00890	Burns Charest LLP
Maynard, James	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00882	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
McIntosh, Daniel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00589	Burns Charest LLP
McMahon, Vincent	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00957	Burns Charest LLP
McNamara, James	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00060	Burns Charest LLP
Melvin Benjamin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00141	Burns Charest LLP
Merced, Edgar	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00870	Burns Charest LLP
Merlyn Massicott	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00356	Burns Charest LLP
Mervyn Henry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00092	Burns Charest LLP
Mervyn Henry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00095	Burns Charest LLP
Michael C. John	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00279	Burns Charest LLP
Michael Clarke	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00978	Burns Charest LLP
Michael Elsworth Matthew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00457	Burns Charest LLP
Michael K Alexander	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00517	Burns Charest LLP
Michael Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00993	Burns Charest LLP
Michael, Coletta	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00904	Burns Charest LLP
Mitchell, Alfred	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00013	Burns Charest LLP
Mitchell, Clayton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00819	Burns Charest LLP
Moe, Russell	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00884	Burns Charest LLP
Montoute-Dumar, Clarita	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00058	Burns Charest LLP
Moore, Steven	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00839	Burns Charest LLP
Morris Benjamin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00980	Burns Charest LLP
Moses, Godclive	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00021	Burns Charest LLP
Munchez-Nurse, Barbara A.	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00061	Burns Charest LLP
Murray, Michael	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00947	Burns Charest LLP
Myrna Lopez	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00282	Burns Charest LLP
Natalia Herman-Sadoo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00115	Burns Charest LLP
Nathalie Desbonnes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00093	Burns Charest LLP
Nathalie Desbonnes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00094	Burns Charest LLP
Neil Corridon	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00031	Burns Charest LLP
Nelson, Clement	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00901	Burns Charest LLP
Newton, Sharon	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00200	Burns Charest LLP
Nieves, Sonia	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00063	Burns Charest LLP
Nina O'Bryan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00455	Burns Charest LLP
Nisbeth, Edric	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00029	Burns Charest LLP
Nobbie, Ainsley	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00677	Burns Charest LLP
Norford, Derrick	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00896	Burns Charest LLP
Norma Nales-Martinez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00346	Burns Charest LLP
Norma Parris-Bruce	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00817	Burns Charest LLP
Norris Rupert St. Henry	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00281	Burns Charest LLP
Octalien, Norbert C	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00887	Burns Charest LLP
Octavia Ferdinand, as PR for the Estate of Octave Ferdinand	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00043	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Onesimus Chiverton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00061	Burns Charest LLP
Osorio, Jr., Pedro	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00033	Burns Charest LLP
Patricia Mathurin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00461	Burns Charest LLP
Patrick Nelson Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00422	Burns Charest LLP
Patrick Phillips	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00032	Burns Charest LLP
Paul, Anthony	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00590	Burns Charest LLP
Paula Crispin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00509	Burns Charest LLP
Pedrito Coto	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00075	Burns Charest LLP
Pedro Oliver	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00850	Burns Charest LLP
Peter Delande	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00625	Burns Charest LLP
Peter Edward	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00027	Burns Charest LLP
Peter, Michael	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00852	Burns Charest LLP
Peterson, Lucien	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00270	Burns Charest LLP
Petronella Sargeant	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00840	Burns Charest LLP
Phangyou, Carl P. J.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00825	Burns Charest LLP
Phillip Collins	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00138	Burns Charest LLP
Phillip E. Daniel	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00278	Burns Charest LLP
Phillip Paul	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00300	Burns Charest LLP
Phillip, Vaughn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00824	Burns Charest LLP
Philogene, Lawrence	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00680	Burns Charest LLP
Pius Fontenelle, as PR of the Estate of Teresa Fontenelle, Deceased	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00889	Burns Charest LLP
Plante, Marion, as the personal representative of the Estate of Joseph Plante	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00929	Burns Charest LLP
Poleon, Celina	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00115	Burns Charest LLP
Poleon, John	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00926	Burns Charest LLP
Pricilla John Baptiste	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00841	Burns Charest LLP
Rambally, Brian	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00023	Burns Charest LLP
Ras, Luis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00874	Burns Charest LLP
Raul Gonzalez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00891	Burns Charest LLP
Rebecca Lestrade	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00619	Burns Charest LLP
Regina Boyer	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00853	Burns Charest LLP
Renee Tann	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00154	Burns Charest LLP
Rennie Benwaree	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00420	Burns Charest LLP
Rennie, Lloyd	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00046	Burns Charest LLP
Rennie, Ronnie	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00899	Burns Charest LLP
Reuben Weekes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00082	Burns Charest LLP
Reuben, Aaron	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00961	Burns Charest LLP
Reynard D Menders, Sr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00716	Burns Charest LLP
Richard A Samuel	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00986	Burns Charest LLP
Richard Allen, Sr	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00971	Burns Charest LLP
Richelieu, Gregory E	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00259	Burns Charest LLP
Richelieu, Margarita	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00912	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Rita Browne	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00274	Burns Charest LLP
Rita Velazquez	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00106	Burns Charest LLP
Rivera, Jose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00036	Burns Charest LLP
Rivera, Sandro	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00963	Burns Charest LLP
Rivera, Santos	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00846	Burns Charest LLP
Rivera-Lopez, Santos	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00057	Burns Charest LLP
Robert Phangyou	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00072	Burns Charest LLP
Roberto Figueroa	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00504	Burns Charest LLP
Roberts, Cuthbert F	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00949	Burns Charest LLP
Roderick Gordon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00076	Burns Charest LLP
Rodney Blake	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00054	Burns Charest LLP
Rodney Solomon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00987	Burns Charest LLP
Roger A Roberts	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00981	Burns Charest LLP
Rollin Viotty	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00024	Burns Charest LLP
Romain, Andrew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00805	Burns Charest LLP
Ronald Sealey	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00979	Burns Charest LLP
Rosa Xavier	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00465	Burns Charest LLP
Rosa, Sonia	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00902	Burns Charest LLP
Rosetta Lawrence	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00156	Burns Charest LLP
Russell, Hulester	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00812	Burns Charest LLP
Sadoo, Ricardo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00817	Burns Charest LLP
Sam, Reginald A.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00815	Burns Charest LLP
Samuel, Virginia	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00237	Burns Charest LLP
Santiago, Bernabe Jr.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00842	Burns Charest LLP
Santiago, Luis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00865	Burns Charest LLP
Sargeant, Vincent	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00068	Burns Charest LLP
Sean Ian Wickham	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00807	Burns Charest LLP
Seecharan, Alvan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00862	Burns Charest LLP
Sharia Durgah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00854	Burns Charest LLP
Sheralda Guadalupe	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00528	Burns Charest LLP
Shirley Alibocas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00557	Burns Charest LLP
Shirley Cuffy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00161	Burns Charest LLP
Silvestre, Juan Riveras	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00820	Burns Charest LLP
Simnia Eugene	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00544	Burns Charest LLP
Simon, Lesroy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00265	Burns Charest LLP
Sirdrina Isaac-Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00429	Burns Charest LLP
Skitter Verna Clercin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00869	Burns Charest LLP
Smith, Anthony	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00835	Burns Charest LLP
Smith, James A	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00017	Burns Charest LLP
Sonia Cirilo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00739	Burns Charest LLP
Sookoo, Richie	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00048	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Sophia Francis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00116	Burns Charest LLP
Soto-Nieves, Irma	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00069	Burns Charest LLP
St Jean Wong, Meredith	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00057	Burns Charest LLP
St Rose, Saraphine	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00073	Burns Charest LLP
St. George Joseph	District Court of the Virgin Islands, Division of St. Croix.	1:2022-CV-00032	Burns Charest LLP
Stafford Browne	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00275	Burns Charest LLP
Stedman Hughes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00648	Burns Charest LLP
Stephanie Granger	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00120	Burns Charest LLP
Stephanie Wheeler	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00636	Burns Charest LLP
Stephen Jeffers	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00298	Burns Charest LLP
Stephenson, Eugene	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00931	Burns Charest LLP
Subniak, Dianan	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00010	Burns Charest LLP
Sydney, John	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00271	Burns Charest LLP
Sykes, Eric	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00018	Burns Charest LLP
Sylvester John	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00830	Burns Charest LLP
Sylvia Barry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00627	Burns Charest LLP
Tabita Phangyou	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00117	Burns Charest LLP
Taylor, Macdonald	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00906	Burns Charest LLP
Thecla Weston	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00715	Burns Charest LLP
Theodile, Ruthine	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00897	Burns Charest LLP
Theodore, Roselyn	District Court of the Virgin Islands, Division of St. Croix.	1:2021-CV-00178	Burns Charest LLP
Theodule, Elizabeth	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00064	Burns Charest LLP
Theresa Dariah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00456	Burns Charest LLP
Theresa Joseph	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00114	Burns Charest LLP
Thomas Thomas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00859	Burns Charest LLP
Thomas, Franklyn M	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00263	Burns Charest LLP
Thorpe, Charline as the personal representative of the Estate of Wilmouth A Hughes	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00932	Burns Charest LLP
Titre, Cyril	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00811	Burns Charest LLP
Treasure, Ferdinand	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00867	Burns Charest LLP
Treasure, Melrose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00066	Burns Charest LLP
Valerie Combie	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2022-CV-00053	Burns Charest LLP
Vega-Vargas, Percio	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00878	Burns Charest LLP
Velazquez, Ada L	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00941	Burns Charest LLP
Verdan Jagrup	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00762	Burns Charest LLP
Verna Rita Richelieu	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00508	Burns Charest LLP
Vernage, Matthew	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00940	Burns Charest LLP
Veronica Eugene	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00550	Burns Charest LLP
Veronica Rita Charles	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00558	Burns Charest LLP
Victor Monroe	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00518	Burns Charest LLP
Victor Ruiz Carrasquillo	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00759	Burns Charest LLP
Victor, Fenton Curtis	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00014	Burns Charest LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Victoria Woodley	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00171	Burns Charest LLP
Vigilant, Timothy	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00056	Burns Charest LLP
Virginia Melius-Michaud	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00425	Burns Charest LLP
Virginia St Rose	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00133	Burns Charest LLP
Viviane Charles Mondesir	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00118	Burns Charest LLP
Wallace, Elton	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00950	Burns Charest LLP
Walters, Shawn	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00019	Burns Charest LLP
Waltrude Hippolyte	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00722	Burns Charest LLP
Wendy Green	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00832	Burns Charest LLP
Wheeler, Joseph C	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00262	Burns Charest LLP
White, Clyde	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00035	Burns Charest LLP
William, Augustine	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00040	Burns Charest LLP
Williams, Anderson Leroy	District Court of the Virgin Islands, Division of St. Croix.	1:2020-CV-00104	Burns Charest LLP
Williams, Carol G.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00836	Burns Charest LLP
Williams, Lennard	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00959	Burns Charest LLP
Williams, Merle	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00062	Burns Charest LLP
Williams, Spencer	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00024	Burns Charest LLP
Williams, Vincent	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00818	Burns Charest LLP
Wilson, Alfred	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00261	Burns Charest LLP
Wiltshire, Christina	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00890	Burns Charest LLP
Winifred Jonas	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00541	Burns Charest LLP
Winifred President	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00136	Burns Charest LLP
Woods, Benjamin	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00875	Burns Charest LLP
Wranda Dariah	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00834	Burns Charest LLP
Xiomara Hernandez-Aquino	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00121	Burns Charest LLP
Yolanda Henry	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00135	Burns Charest LLP
Younge, Everette	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00810	Burns Charest LLP
Younge, Grantley A	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2020-CV-00877	Burns Charest LLP
Yvette Ballantine-Phillips	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00719	Burns Charest LLP
Yvie Poleon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00159	Burns Charest LLP
Zenia Raymond	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00539	Burns Charest LLP
Zulaika Ahamad	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2021-CV-00545	Burns Charest LLP
Carmela Susino on her own behalf and on behalf of the Estate of Decedent, Luciano Susino and his beneficiaries	District Court of the Virgin Islands, Division of St. Thomas	3:2021-cv-00038	Law Office of Ryan W. Greene
MARINA STANISLAS on her own behalf and on behalf of the estate of DECEDENT KELVIN STANISLAS and all other statutory beneficiaries of DECEDENT KELVIN STANISLAS,	Superior Court of the Virgin Islands, Division of St. Thomas and St. John	ST-2021-CV-00042	Law Office of Ryan W. Greene
Abbott v. HOVENSA and HOVIC	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2010-CV-00270	Lee J. Rohn and Associates, LLC
Amadee, Apaul v. HOVIC	Superior Court of the Virgin Islands, Division of St. Croix.	212/1998	Lee J. Rohn and Associates, LLC
Julien St. Rose et al. v. VI Industrial Maintenance, Jacobs Industrial Maintenance, HOVENSA, HOVIC and Hess	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2002-CV-00598	Lee J. Rohn and Associates, LLC
Pagan v. Hess et al.	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2005-CV-00740	Lee J. Rohn and Associates, LLC
Jose M. Rivera	In the Circuit Court Third Judicial Circuit Madison County, Illinois	No.: 2021-L-00094	Maune Raichle Hartley French & Mudd, LLC
Bruce Torgerson	Supreme Court of The State of New York, County of New York	190051/2019	Meiowitz & Wasserberg, LLP

Claimant Name	Jurisdiction / State Filed	Case No. / Docket No.	Plaintiff Counsel
Estate of Thomas Lannaghan	Supreme Court of The State of New York, County of New York	190166/2014	The Early Law Firm, LLC
Darren Delozier	In the Circuit Court Twentieth Judicial Circuit St. Clair County, Illinois	No.: 2020-L-00095	The Gori Law Firm, P.C.
Estate of Benjamin Freeman	In the Circuit Court Third Judicial Circuit Madison County, Illinois	No.: 2019-L-00307	The Gori Law Firm, P.C.
Estate. of Patricia Stewart	In the Circuit Court Twentieth Judicial Circuit St. Clair County, Illinois	No.: 2020-L-00065	The Gori Law Firm, P.C.
Adolphus Gordon	Superior Court of the Virgin Islands, Division of St. Croix.	SX-1998-cv-00423	Thomas Alkon P.C.
Alexander Gumbs	District Court of the Virgin Islands, Division of St. Croix.	1:04-cv-00103-RLF-GWC	Thomas Alkon P.C.
Enno Lansiquot	Superior Court of the Virgin Islands, Division of St. Croix.	SX-2097-CV-00431	Thomas Alkon P.C.